

THE COCHRAN FIRM  


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July 16, 2020

**VIA ECF**

The Honorable Sidney Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: Candie Hailey Means v. City of New York, et al.,  
Case No. : 17 CV 5374 (SHS) (KNF)

Your Honor:

We represent Plaintiff, Candie Hailey Means in the above-referenced action. I write to respectfully request the Court's permission to file certain videos under seal, previously referenced as Exhibit AA in Mr. Stavridis' Reply Declaration in Support of Defendants' motion for summary judgment (ECF Dkt# 131 and 137).

Plaintiff is seeking permission to file these video files under seal pursuant to the parties Stipulated Protective Order So Ordered by the Court. These videos depict "DOC facilities and/or property, detainees or DOC employees," which are covered under ¶ 2(e) of the Protective Order.

Thank you for your consideration.

Respectfully Submitted,

THE COCHRAN FIRM



Tracey L. Brown

cc: Steve Stavridis, Esq. (via ECF)

**Request to seal videos granted.**

**Dated: New York, New York**  
**March 15, 2021**

**SO ORDERED:**



**Sidney H. Stein, U.S.D.J.**

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